

1 **LAQUER URBAN CLIFFORD & HODGE LLP**

2 Susan Graham Lovelace, State Bar No. 160913

3 Email: *Lovelace@luch.com*

4 Andrew Quinn Thompson, State Bar No. 340286

5 Email: *AThompson@luch.com*

6 200 South Los Robles Ave., Suite 500

7 Pasadena, California 91101-2432

8 Telephone: (626) 449-1882 / Facsimile: (626) 449-1958

9 Counsel for Plaintiffs, Trustees of the Southern California
10 IBEW-NECA Pension Plan, et al.

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 TRUSTEES OF THE SOUTHERN
14 CALIFORNIA IBEW-NECA PENSION
15 PLAN, TRUSTEES OF THE
16 SOUTHERN CALIFORNIA IBEW-
17 NECA DEFINED CONTRIBUTION
18 TRUST FUND, TRUSTEES OF THE
19 SOUTHERN CALIFORNIA IBEW-
20 NECA HEALTH TRUST FUND,
21 TRUSTEES OF THE SOUTHERN
22 CALIFORNIA IBEW-NECA
23 SUPPLEMENTAL UNEMPLOYMENT
24 BENEFIT TRUST FUND, TRUSTEES
25 OF THE LOS ANGELES COUNTY
26 ELECTRICAL EDUCATIONAL AND
TRAINING TRUST FUND, TRUSTEES
OF THE NATIONAL ELECTRICAL
BENEFIT FUND, TRUSTEES OF THE
SOUTHERN CALIFORNIA IBEW-
NECA LABOR-MANAGEMENT
COOPERATION COMMITTEE,
TRUSTEES OF THE NATIONAL
NECA-IBEW LABOR-MANAGEMENT
COOPERATION COMMITTEE TRUST
FUND, CONTRACT COMPLIANCE
FUND, LOS ANGELES ELECTRICAL
WORKERS CREDIT UNION, and
SOUTHERN CALIFORNIA IBEW-
NECA ADMINISTRATIVE
CORPORATION,

27 Plaintiffs,

28 vs.

29 CALIFORNIA STREET LIGHTING, a
30 California corporation,

31 Defendant.

32 CASE NO.: 5:23-cv-2012-WLH-DTB
33 ASSIGNED TO THE HONORABLE
34 WESLEY L. HSU

35 **NOTICE OF MOTION AND
36 MOTION FOR DEFAULT
37 JUDGMENT**

38 [Fed. R. Civ. Proc. 55(b)(2)]

39 **FILED SEPARATELY,
40 CONCURRENTLY AND IN
41 SUPPORT THEREOF:**

- 42 **1. MEMORANDUM OF POINTS
43 AND AUTHORITIES;**
- 44 **2. DECLARATION OF IGAL
45 KHOSHELESAN;**
- 46 **3. DECLARATION OF RAUL
47 RODRIGUEZ;**
- 48 **4. DECLARATION OF
49 ANDREW Q. THOMPSON;
50 and**
- 51 **5. [PROPOSED] JUDGMENT**

52 Hearing Information:

53 Date: March 15, 2024

54 Time: 1:30 p.m.

55 Ctrm: 9B, 9th Floor

1 TO THE HONORABLE WESLEY L. HSU AND THE CLERK OF THE UNITED
2 STATES DISTRICT COURT, CENTRAL DISTRICT, AND DEFENDANT,
3 CALIFORNIA STREET LIGHTING:

4 **PLEASE TAKE NOTICE** that on March 15, 2024, at 1:30 p.m., or as soon
5 thereafter as counsel may be heard, Plaintiffs, Trustees of the Southern California
6 IBEW-NECA Pension Plan, et al., will, and hereby do, move the Court in Courtroom
7 9B of the First Street Courthouse, located at 350 W. 1st Street, Los Angeles, CA
8 90012, before the Honorable Wesley L. Hsu, United States District Judge, for entry of
9 default judgment in favor of Plaintiffs and against California Street Lighting, a
10 California corporation, for the principal amount of \$92,934.70, exclusive of attorneys'
11 fees and costs.

12 This motion will be made on the grounds that the Complaint in this action was
13 filed on October 2, 2023. [Dkt. 1.] The Summons and Complaint were served on
14 Defendant, California Street Lighting, a California corporation, on October 20, 2023.
15 The Declaration of Service was filed by Plaintiffs on October 25, 2023. [Dkt. 7.] No
16 answer or other response to the Complaint has been filed, and Defendant's default was
17 entered in the Civil Docket in the office of the Clerk of this Court on December 11,
18 2023. [Dkt. 12.] No proceedings have been taken by Defendant to set aside the
19 default.

20 This motion does not seek a default judgment against an infant or incompetent
21 person, nor does the Soldiers' and Sailors' Relief Act of 1940 or the Servicemembers'
22 Civil Relief Act apply in this action.

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This motion will be based on this notice of motion and motion, the declarations of Raul Rodriguez, Igal Khoshelesan, and Andrew Q. Thompson, the memorandum of points and authorities filed herewith, the proposed judgment lodged herewith, and on all the pleadings and documents on file herein.

DATED: February 7, 2024 LAQUER, URBAN, CLIFFORD & HODGE LLP

By: /s/ - Andrew Q. Thompson

Andrew Q. Thompson
Counsel for Plaintiffs, Trustees of the Southern California IBEW-NECA Pension Plan, et al.